

HEARING DATE AND TIME: September 14, 2011 at 10:00 a.m. (Prevailing Eastern Time)  
OBJECTION DATE AND TIME: September 7, 2011 at 4:00 p.m. (Prevailing Eastern Time)

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Counsel for the Official Committee of Unsecured  
Creditors of Lehman Brothers Holdings Inc., et al.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF LEHMAN BROTHERS HOLDINGS INC., ET AL.,  
PURSUANT TO 11 U.S.C. §§ 1103(c) AND 1109(b), FOR ENTRY OF AN  
ORDER GRANTING LEAVE, STANDING AND AUTHORITY TO  
PROSECUTE AND, IF APPROPRIATE, SETTLE CAUSES OF  
ACTION ON BEHALF OF LEHMAN COMMERCIAL PAPER INC.**

**PLEASE TAKE NOTICE** that a hearing on the annexed motion (the  
“Motion”)<sup>1</sup> of the Official Committee of Unsecured Creditors (the “Committee”) of  
Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in possession

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

(collectively, the “Debtors”), pursuant to sections 1103(c) and 1109(b) of title 11 of the United States Code (as amended, the “Bankruptcy Code”) for entry of an order granting the Committee standing to prosecute and, if appropriate, settle: (1) certain adversary proceedings previously commenced by Lehman Commercial Paper Inc. (“LCPI”); and (2) additional claims and/or causes of action against any persons or entities (the “LMA Participants”) that received loan elevations (the “Transfers”) pursuant to Loan Market Association agreements (the “LMA Agreements”) and entered into tolling agreements with LCPI (collectively, the “Adversary Proceedings”), all as more fully described in the Motion, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on **September 14, 2011 at 10:00 a.m. (Prevailing Eastern Time)** (the “Hearing”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the

chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Jacqueline Marcus, Esq., attorneys for the Debtors; (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq.; (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq., attorneys for the Official Committee of Unsecured Creditors; and (v) all parties who have requested notice in these chapter 11 cases, so as to be so filed and received by no later than **September 7, 2011 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing. If an objection is filed the moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York  
August 31, 2011

By: /s/ Dennis F. Dunne  
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